

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

IN THE MATTER OF THE SEARCH OF A
U.S. POSTAL SERVICE PARCEL:
TRACKING NUMBER ER 154 265 114 US
CURRENTLY LOCATED AT DULLES
PROCESSING AND DISTRIBUTION
CENTER AT 44715 PRENTICE DRIVE,
DULLES, VIRGINIA 20101 IN THE
EASTERN DISTRICT OF VIRGINIA

Case No. 1:24-SW-935

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR ONE U.S. MAIL PARCEL**

I, Sarah T. Bolger, being duly sworn, hereby depose and state:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since August 2017. Upon entering USPIS, I completed fourteen weeks of training in Potomac, Maryland. The training covered various aspects of federal law enforcement including the investigation of narcotics-related offenses. I have received additional training specifically in conducting narcotics investigations and participated in investigations involving possession with intent to distribute and distribution of controlled substances. I have participated in multiple interdictions, controlled deliveries, seizures, and search warrants, which have resulted in criminal arrests and prosecutions. Prior to being a Postal Inspector, I was a Police Officer for the Henrico County Police Division for 9 years, between 2008 and 2017.

2. The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that

were not made personally by me were relayed to me by the persons who made the observations. Sources of information used routinely in this process include verifying zip codes through a public database maintained by the U.S. Postal Service (*USPS.com*) and checking associations between names and addresses in a law enforcement database (*CLEAR*). This affidavit contains only that information necessary to establish probable cause in support of an application for the requested search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

SUBJECT PARCEL

3. This Affidavit is submitted in support of an Application for a Search Warrant for one subject U.S. Mail Parcel, hereinafter “the Subject Parcel” (further described in Attachment A). The Subject Parcel is currently located at the U.S. Postal Service, Dulles Processing and Distribution Center, 44715 Prentice Drive, Dulles, Virginia, 20101, which is located within the Eastern District of Virginia. I submit that the facts alleged herein provide probable cause to believe that a search of the Subject Parcel will yield evidence, fruits, and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846, relating to the distribution of controlled substances. I therefore request authority to search the Subject Parcel for the items described in Attachment B.

4. The Subject Parcel is identified as follows:¹

¹ For all of the tables in this Affidavit regarding the Subject Parcel, I have listed the sender and recipient information as it appears on the Subject Parcel. In other words, the capitalization, punctuation, and spelling of addresses in the table are the same as that which I observed on the Subject Parcel.

<i>Subject Parcel</i>	<i>Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>	<i>Current Parcel Location</i>
1	(E) ER 154 265 114 US	Marvin Aldaz 3236 N 54 th Ln Phoenix AZ 85031	Mary Johnson 9 Davis Ave SW Leesburg VA 20175	Dulles Processing and Distribution Center in Dulles, VA, located in the Eastern District of Virginia

BACKGROUND ON FACTORS INDICATING CONTRABAND

5. Based upon my training and experience, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or narcotics proceeds (currency), and personal and financial documents related to such proceeds and narcotics. These factors, detailed more fully below, are used as a pointer system to identify packages requiring further investigation. A totality of factors or characteristics creates reasonable suspicion prior to presenting a parcel to a canine for examination.

6. The Subject Parcel exhibited several of these factors and was also alerted to by a trained canine. While there are many characteristics that experienced Postal Inspectors look for, the most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

7. **Contrasts observed between Legitimate Business Parcels and Drug Parcels:**
As alternatives to First-Class Mail, which does not always provide a customer with the ability to track the progress of a parcel through the system, the U.S. Postal Service offers Priority Mail Express and Priority Mail.

- a. Priority Mail Express: Priority Mail Express is guaranteed to be delivered on a set date and time, usually overnight (the deadline is determined at the time of mailing). The customer receives a receipt with this guaranteed information and can opt for a signature requirement when the parcel is delivered. Customers can track the parcel online by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card.
- b. Priority Mail: Priority Mail has a delivery service standard of two to four business days, but it is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Business Priority Mail Express parcels typically weigh no more than eight ounces, and business Priority Mail parcels typically weigh no more than two pounds. Drug packages typically exceed these weights; in my experience, it is fairly easy to separate out smaller parcels, which constitute seventy to eighty percent of all Priority Mail Express and Priority Mail parcels, from other parcels. Address labels on business parcels are typically typed, and address labels on drug packages are typically handwritten. Typically, drug traffickers using Priority Mail Express will opt out of the signature requirement.

- c. First-Class Mail: Some individuals mailing illicit narcotics through the U.S. Postal Service are now utilizing both First-Class package service with tracking, and First-Class mail without tracking, as a way to obscure their illicit activity and to circumvent law enforcement profiling efforts. First-Class packages containing illicit narcotics may weigh less than one pound, or even be mailed in flat envelopes, depending on the type of narcotic involved.

8. **Invalid Sender/Return Address:** When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number or street. The name of the sender is also typically invalid: I have seen packages sent by persons with names of celebrities, cartoon characters, or fictional persona, but more often a search of the *CLEAR* database reflects that there is no association between the name of the sender and the address provided.

9. **Invalid Recipient/Address:** It may appear counter-productive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

10. **Destination State:** If other criteria are present, I know from experience and training that a domestic package addressed to a source narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains proceeds from the sale of illegal narcotics and/or illegal narcotics.

11. **State of Origin:** If other criteria are present, I know from experience and training that a domestic package sent from a source narcotics state, which is a state where narcotics often originate, can further indicate that a parcel contains controlled substances. The Subject Parcel originates in Arizona, where narcotics trafficking is more prevalent.

12. **Electronic Postage:** The U.S. Postal Service created electronic postage as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. In my training and experience, drug traffickers may sometimes create electronic postage accounts as a means of giving legitimate appearance to their drug mailings. In these cases, they typically create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona and other known “source” states as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed unlike the typical drug related mailing label, which is routinely handwritten.

13. **Additional Factors:** Additional factors seen less frequently, but nevertheless noteworthy, include:

- a. Smell: The odors of cocaine, marijuana, and methamphetamine are distinct, and, through experience, Postal Inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest the contents are narcotics are from masking agents. Common masking agents used in an attempt to thwart law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

- b. Packaging: Heavily taped parcels are another factor that will suggest a drug parcel. I have also observed excessive glue on package flaps.

14. It is my experience that when a combination of the factors outlined above are observed, a drug detection canine will likely “alert” next to the parcel, indicating the dog has detected the odor of narcotics. Therefore, these factors become a reliable way to profile parcels for additional scrutiny and inspection.

PROBABLE CAUSE

15. On or about December 2, 2024, the Subject Parcel was mailed from Maryvale Station Post Office, 4415 N Maryvale Pkwy, Phoenix, AZ 85031 to 9 Davis Ave SW, Leesburg, VA 20175. On December 9, 2024, the Subject Parcel was intercepted by your affiant in the Eastern District of Virginia from the Leesburg Annex, 75 Lawson Rd SE Ste 106, Leesburg, VA 20175. Your affiant placed the Subject Parcel in holding at the USPIS Dulles Domicile in the DULLES PROCESSING AND DISTRIBUTION CENTER.

16. As listed in the table below, the Subject Parcel has the following characteristics:

Subject Parcel	
Priority Express/Priority/Registered/1 st Class	(E)- ER 154 265 114 US 12” x 3.5” x 14.125”
Weight of Parcel	6 lbs 5 ozs
Shipping Label	HANDWRITTEN
Sender Name/Address Associated	SEE PARAGRAPH 17- Not Currently Associated
Recipient Name/Address Associated	SEE PARAGRAPH 18- Not Currently Associated
Signature Requirement	No
Source Area	Yes, Arizona

Other Suspicious Characteristics	SEE PARAGRAPH 19
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17. Your affiant reviewed records from CLEAR to conduct a check of the **sender address** listed on the **Subject Parcel**, to wit, “Marvin Aldaz, 3236 N 54th Ln, Phoenix, AZ 85031.” Your affiant determined the address is a valid address. A further inquiry using CLEAR showed that the name “Marvin Aldaz” was associated with this address in April 2019, but is not currently associated with the address. By entering a false sender name or false sender return address on the USPS shipping label, criminals endeavor to protect and shield their identity and avoid detection by law enforcement.

18. Your affiant reviewed records from CLEAR to conduct a check of the **recipient address** listed for the **Subject Parcel**, to wit, “Mary Johnson, 9 Davis Ave SW, Leesburg, VA 20175.” Your affiant determined the address is a valid address. A further inquiry using CLEAR showed that the name “Mary Johnson” was associated with this address in November 2010, but is not currently associated with the address. CLEAR currently shows the address as a business, “Auto Advantage of VA.” The entry of a false addressee, recipient name, or incomplete address on the shipping label also provides the true intended recipient with plausible deniability should they be confronted by law enforcement.

19. Your affiant considers the Subject Parcel to be suspicious because, among other things: (1) postage for the Subject Parcel was paid for in cash in the amount of \$110.00; (2) the seams of the Subject Parcel were heavily taped, which is a technique often utilized by criminals in an attempt to prevent odors of controlled substances from emanating; (3) the address information

for both the sender and recipient of the Subject Parcel were both false, utilizing names of prior occupants of the addresses; and (4) the contents of the package were bulging.

20. Based on the suspicious characteristics described above, this package was presented to a trained police canine for examination on December 9, 2024. Canine Storm and his handler, Fairfax Police Detective Patrick Briant, were utilized in an attempt to determine whether the Subject Parcel contained illegal narcotics. Standard protocols for canine detection were followed using Canine Storm. Canine Storm was last certified on September 16, 2024, to alert on the odors of marijuana, cocaine and its derivatives, heroin, methamphetamine, and MDMA (ecstasy). Canine Storm is trained regularly to ensure the canine's accuracy in the detection of drug odors.

21. The Subject Parcel was placed among other USPS Mail at the USPS Dulles Processing and Distribution Center, in Dulles, Virginia. At that time, Fairfax Police Detective Patrick Briant and Canine Storm were brought in to search the area. The handler observed Canine Storm and then informed your affiant that the dog alerted on the Subject Parcel, which was hidden arbitrarily among other USPS Parcels.

CONCLUSION

20. I submit that, based upon the above indicators exhibited by the Subject Parcel, Canine Storm's indication on the package, as well as my training, experience, and historically seized shipments, there is probable cause to believe that the above-described Subject Parcel contains narcotics or controlled substances and/or materials relating to the distribution of controlled substances through the United States Mail. Therefore, I respectfully request that this Court issue a

search warrant for the Subject Parcel, as described in Attachment A, authorizing the seizure of the items described in Attachment B.

Sarah Bolger

Sarah T. Bolger
United States Postal Inspector

Attested to in accordance with the requirements of
Fed. R. Crim. P. 4.1 via telephone on December 12, 2024:

Lindsey R Vaala Digitally signed by Lindsey R Vaala
Date: 2024.12.12 11:48:03 -05'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge
Alexandria, Virginia

ATTACHMENT A**DESCRIPTION OF PARCELS TO BE SEARCHED**

<i>Subject Parcel</i>	<i>Express (E), Priority (P), First Class (F), or Registered (R) Tracking ID Number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>	<i>Current Parcel Location</i>
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ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED

1. Narcotics or other controlled substances, as well as contraband related to drug trafficking,
e.g., packaging materials;
2. United States currency or other financial instruments that appear to be proceeds related to
the distribution or purchase of illegal narcotics;
3. Customer records related to drug trafficking;
4. Business ledgers, lists, and notations relating to drug trafficking;
5. Prescription records;
6. Records of a financial nature that suggest how payment for illegal narcotics is conducted;
and
7. Other evidence of transactions in relation to drug trafficking.